



Stauffer Chemical Company

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8287

CERTIFIED MAIL
RETURN RECEIPT REQUIRED

January 14, 1988

Ms. Susan Swales (5HE-12)
U.S. Environmental Protection Agency
230 S. Dearborn
Chicago, IL 60604

Re: Fields Brook, Ashtabula County, Ohio

Dear Ms. Swales:

This letter responds to the letter addressed to Stauffer Chemical Company, dated November 6, 1987, requesting certain information under Section 104 of CERCLA. The information requested relates to the release or threatened release of hazardous substances, pollutants, or contaminants into or around Fields Brook, Ashtabula County, Ohio. Our responses follow the numbering of the requests in the enclosed Request for Information.

ANSWERS TO REQUEST FOR INFORMATION

1. Stauffer Chemical Company is a Delaware corporation, incorporated in 1953. Stauffer Chemical Company was acquired by Imperial Chemical Industries PLC (ICI) on July 22, 1987. The registered agent for ICI is CT Corporation, 815 Superior Avenue, N.E., Cleveland, Ohio 44114. Stauffer Chemical Company will be considered as "The addressed corporation" or "TAC" in these responses.

2. To the best of my knowledge, TAC has never owned or operated a facility in the Fields Brook water basin. Pursuant to a telephone conversation on January 11, 1988 with Mr. Kerry Street of U.S. EPA Region V, I was informed that U.S. EPA has information the TAC was the owner or operator of a facility presently owned by SCM Corporation, located at 1704 State Road, Ashtabula. Mr. Street indicated that TAC would have owned that facility between an unknown acquisition date and 1958. We are investigating this matter and will supplement this response with our findings, by January 25, 1988.

TAC did own and operate a facility named Calhio Chemicals Company, located at 3647 Shepard Road, Perry, Ohio.

This facility is presently owned by ICI. The Calhio Chemicals Company was formerly operated as a joint venture between TAC and another corporation. This Calhio Chemicals Company facility is located in Lake County, not Ashtabula County, and is located approximately twenty miles West of the City of Ashtabula. A review of the only site maps which were made available, which are set forth in a July 1986 Feasibility Study Summary, indicates that this Calhio Chemicals Company facility is not located in the Fields Brook watershed and does not discharge into it.

3. To the best of my knowledge, and based upon an inquiry to other employees of TAC, TAC did not own or convey property in or adjacent to the Fields Brook water basin.

4. See responses 1, 2, and 3 above.

5.	"	"	"
6.	"	"	"
7.	"	"	"
8.	"	"	"
9.	"	"	"
10.	"	"	"
11.	"	"	"
12.	"	"	"
13.	"	"	"
14.	"	"	"
15.	"	"	"
16.	"	"	"
17.	"	"	"
18.	"	"	"
19.	"	"	"
20.	"	"	"
21.	"	"	"
22.	"	"	"
23.	"	"	"

24. See responses 1, 2 and 3 above. This response assumes that the information requested relates to the release or threatened release of hazardous substances, pollutants, or contaminants into or around Fields Brook, Ashtabula County, Ohio.

25. See responses 1, 2, and 3 above.

26. To the best of my knowledge, and based upon an inquiry to other employees of TAC, TAC never disposed or arranged for the disposal of any materials in the Reserve Environmental Services, Inc. landfill.

27. No. This response assumes that the information requested relates to the release or threatened release of hazardous substances, pollutants, or contaminants into or around Fields Brook, Ashtabula County, Ohio.

28. See responses 1, 2, and 3 above.

29. No. This response assumes that the information requested relates to the release or threatened release of hazardous substances, pollutants, or contaminants into or around Fields Brook, Ashtabula County, Ohio.

30. See responses 1, 2, and 3 above.

31. None. this response assumes that the information requested relates to the release or threatened release of hazardous substances, pollutants, or contaminants into or around Fields Brook, Ashtabula County, Ohio.

32. None. This response assumes that the information requested relates to the release or threatened release of hazardous substances, pollutants, or contaminants into or around Fields Brook, Ashtabula County, Ohio.

33. None. See response 32 above.

34. None. See response 32 above.

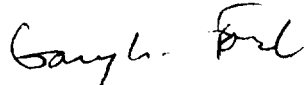
35. None.

36. None.

Question 37 of the November 6, 1987 letter requests information on insurance coverage, including copies of policies, for TAC. It is our position that insurance information is not obtainable under the statutory authorities cited in your November 6, 1987 letters. Furthermore, the Agency has not provided a clear statement of reasons why it believes it needs the information.

In order to assist us in focusing our investigaiton on the matter, it would be helpful if you could provide us with the specific information, including any documents, you have which relate to your allegation that TAC was involved in the Fields Brook site.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gary L. Ford".

Gary L. Ford
Counsel